

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI

In re:)
RICHARD BANGE,)
) June 6, 2017
Debtor,)
)
CITIFINANCIAL SERVICING LLC) Case No. 14-48292
AS CREDITOR)
) Hearing: June 14, 2017
Movant,) Time: 10:00 a.m.
) Location: 5 North
V.) Ch. 13
)
RICHARD BANGE,)
)
Respondent.)

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Debtor, Richard Bange, by and through his counsel, Randall T. Oettle, of R.O.C. Law, Randall Oettle Company, P.C., and for his Response to CitiFinancial Services, LLC's Motion for Relief from Automatic Stay or in the Alternative, to Dismiss (the "Motion"), states the following:

1. Admit Paragraph 1.
2. Admit Paragraph 2.
3. Admit Paragraph 3.
4. Admit Paragraph 4.
5. Admit Paragraph 5.
6. Admit Paragraph 6.
7. Admit Paragraph 7.

8. Admit, Answering further, and affirmatively, Debtor requires proof of the amount of his delinquency and Debtor will have sufficient funds to be current, or within the range of entering a stipulated order, on or before the hearing date.

9. See Paragraph 8.

10. See Paragraph 8.

11. See Paragraph 8.

12. See Paragraph 8.

WHEREFORE, Debtors, Richard Bange, respectfully requests that CitiFinancial Servicing LLC.'s Motion for Relief be denied, and that the Court grant such other and further relief as this Court deems just under the law and circumstances.

Respectfully submitted,

/s/ Randall T. Oettle
Randall T. Oettle, MoBar #46820
R.O.C. Law
Randall Oettle Company, P.C.
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ROettle@ROCLaw

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the above Response was served, via electronic notification and via First Class, U.S. Mail, postage prepaid, on this 6th day of June, 2017, on the following:

William Holmes
612 Spirit Drive
St. Louis, MO 63005

Diana S. Daugherty
U.S. Chapter 13 Trustee–Electronic Notice

/s/ Randall Oettle

